

DAN SIEGEL, SBN 56400 -
 DEAN ROYER, SBN 233292
 SIEGEL & YEE
 499 14th Street, Suite 300
 Oakland, California 94612
 Telephone: (510) 839-1200
 Facsimile: (510) 444-6698

Attorneys for Defendants
 SAL ROSSELLI, *et al.*

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

SERVICE EMPLOYEES INTERNATIONAL)	Case No. 09-CV-0404 WHA
UNION, <i>et al.</i> ,)	
Plaintiffs,)	AMENDED SUPERSEDEAS BOND
vs.)	POSTED BY DEFENDANT GLENN
SAL ROSSELLI, <i>et al.</i> ,)	GOLDSTEIN
Defendants.)	Hon. William H. Alsup

A judgment was entered in the above-captioned case in the United States District Court for the Northern District of California on April 12, 2010, against appellant Glenn R. Goldstein in favor of appellee Service Employees International Union-United Healthcare Workers-West (UHW) in the amount of \$73,850. UHW has levied \$875.23 in partial satisfaction of the judgment, leaving \$72,974.77 as the amount outstanding on the judgment.

Glenn R. Goldstein has filed a timely notice of appeal of the judgment to the United States Court of Appeals for the Ninth Circuit and desires to suspend enforcement of the judgment pending determination of the appeal.

1 Glenn R. Goldstein undertakes and promises to pay to UHW all damages, costs, and
2 interest that may be awarded to it following the appeal of this matter up to the sum of \$91,218.46
3 if

- 4 a. the judgment so appealed is affirmed;
- 5 b. the appeal is dismissed; or.
- 6 c. Glenn R. Goldstein fails to promptly pay to UHW all sums awarded against him, in or
7 following the appeal in this action, including any costs that the court of appeal may
8 award if the judgment is modified.
9

10 If Glenn R. Goldstein fulfills the obligations on appeal set forth above, then this
11 obligation will become void. Otherwise this obligation will remain in full force and effect.

12 Glenn R. Goldstein hereby satisfies the requirement of Local Rule 65.1-1 of the United
13 States District Court for the Northern District of California, and the Court's orders by:

14 (1) Depositing 50 percent (\$45,609.23) of the required bond in cash with the
15 Clerk of the Court;

16 (2) Pledging real property in California not exempt from execution, the value of
17 which is more than sufficient to satisfy the remaining 50 percent of the bond;

18 **(3) Glenn Goldstein is planning to refinance the loan on his home in a**
19 **manner that will not impair his obligations as set forth above.**

20 **(4) Counsel for plaintiffs has advised the undersigned that if the Court**
21 **approves this modification of the bond such that they are left with sufficient security**
22 **for the judgment, they will (1) not oppose the modification and (2) remove the**
23
24
25
26
27
28

1 lien they have placed on Mr. Goldstein's property, which prevents him from
2 obtaining the loan modification.

3 Dated: January 30, 2013

4 SIEGEL & YEE

5 By /s/
6 Dan Siegel

7 Attorneys for Defendants
8 SAL ROSSELLI, et al.

9
10 Glenn R. Goldstein declares as follows:

11 (1) The address of the property that I own that I am pledging as security for this
12 bond to secure payment of the judgment is 909 Creston Road, Berkeley, California
13 94708.

14 (2) I am the owner of said property and have the authority to pledge said property
15 as security.

16 (3) The fair market value of the property is **\$725,000**.

17 (4) The outstanding balance of all loans secured by the property **will be \$307,000**
18 **if the Court approves this amended supersedeas bond.**

19 (5) The names and addresses of all lenders of all loans secured by said property is:
20 Chase, PO BOX 78420, Phoenix, AZ 85062-8420.

21 (6) All liens, charges, and other encumbrances on the property are: none.

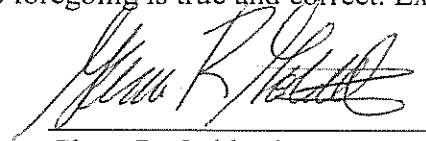
22 (7) I hereby promise not to alienate, encumber or impair the value of the property
23 until the bond is discharged without leave of Court.

24 (8) I hereby waive any homestead exemption pertaining to the property.

25 (9) I hereby promise to record this bond and the judgment against me with the
26
27
28


1 Alameda County Recorder promptly upon its approval by the Court.

2 I declare under penalty of perjury that the foregoing is true and correct. Executed on
3 January 31, 2013, at Oakland, California.

4 
5 Glenn R. Goldstein

6 APPROVED
7

8 Dated: February 13, 2012
9

10 
11 United States District Judge
12 William Alsup
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28